

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PLANET TECHNOLOGIES, INC.,

Plaintiff,

vs.

PLANET TECHNOLOGY LLC and
PEG HOLDCO, INC. d/b/a THE
PLANET GROUP,

Defendants.

CASE NO. 1:23-CV-07071

HON. VIRGINIA M. KENDALL

JURY TRIAL DEMANDED

JOINT MOTION FOR CONTINUANCE OF SETTLEMENT CONFERENCE

Plaintiff Planet Technologies, Inc. (“Plaintiff” or “PTI”), and Defendants Planet Technology LLC and PEG Holdco, Inc. d/b/a The Planet Group (“Defendant” or (“PTLLC”), respectfully jointly move the Court to continue the settlement conference, currently scheduled for September 11, 2024, approximately 60 days. This is the Parties’ first request for an extension.

Good cause exists for the continuance because counsel for the parties have focused their time over the past three months negotiating a settlement. The parties believe they are close to agreeing on a final settlement, but the settlement likely will not be finalized before Plaintiff’s settlement letter is due on August 28, 2024. While the parties are hopeful that the settlement conference will ultimately not be necessary, if the parties are unable to reach an settlement on their own now, the additional time requested is necessary to permit the parties to complete discovery prior to the settlement conference with the Court.

Accordingly, the Parties respectfully request that the Court continue the settlement conference scheduled in this matter for September 11, 2024 by approximately 60 days.

Respectfully submitted this 26th day of August, 2024.

By: /s/ Steven Barentzen (with permission)

Steven Barentzen
Law Office of Steve Barentzen
1101 30th Street, NW, Suite 500
Washington, DC 20007
Telephone: (202) 289-4333

*Counsel for Plaintiff Planet
Technologies, Inc.*

By: /s/ Nicole M. Prefontaine

David J. Marr
James P. Murphy
Nicole Prefontaine
Clark Hill PLC
130 E. Randolph Street, Suite 3900
Chicago, Illinois 60601

Telephone: (312) 985-5900
Facsimile: (312) 985-5999

Of Counsel:

J. Alexander Hershey
(*Pro Hac Vice* forthcoming)
Clark Hill, PLC
One Oxford Centre
301 Grant Street, 14th Floor
Pittsburgh, PA 15219
Telephone: (412) 394-7711
Facsimile: (412) 394-2555

*Counsel for Defendants
Planet Technology LLC and
PEG Holdco, Inc. d/b/a The Planet
Group*